

EXHIBIT A

1 - 147

IN THE UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

RONALD & PATRICIA SHAMON,)	
)	
Plaintiff,)	
-v-)	DOCKET NO.
)	04-11674-WGY
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

THE ORAL DEPOSITION OF RONALD SHAMON, held pursuant to Notice, and the applicable provisions of the Federal Rules of Civil Procedure, before Diana Strzeminski, a Court Reporter and Notary Public, within and for the Commonwealth of Massachusetts, at the offices of the United States Attorney, 1 Courthouse Way, Suite 9200, Boston, Massachusetts, on Wednesday, March 16, 2005, commencing at 12:52 p.m.

COPY

APEX Reporting
(617) 426-3077

1 A Yes.

2 Q Do you own any other real estate?

3 A Any other real estate?

4 Q Yes.

5 A I have an interest in Nichols Street in Norwood,
6 Mass.

7 Q What do you mean by an interest?

8 A Well, from my previous divorce, which is in '85,
9 1985.

10 Q Can you explain further what you mean by interest?

11 A Well the settlement specified that I have a fifty
12 percent interest in the property.

13 Q Okay. And are you currently married?

14 A Yes.

15 Q To whom?

16 A Patricia Shamon, S-H-A-M-O-N, Shamon.

17 Q And when were you married?

18 A April 12 of 2002.

19 Q And you said that you were married before?

20 A Yes.

21 Q To whom?

22 A Helen -- maiden name or--

23 Q Maiden name is fine.

24 A Michaud, M-I-C-H-A-U-D.

25 Q Could you say that again?

1 A Excruciating pain.

2 Q Did that pain continue even after he took the
3 scope out?

4 A It was sore. The pain was really excruciating.
5 When he took the scope out, it was still pretty high; the
6 pain was still at a high level. But the pain--

7 I told him, I said, "Stop it," you know what I
8 mean? He said, "I'm sorry. I'm sorry."

9 I was petrified at that point.

10 Q Now, describe the pain. Was it a sharp pain?

11 A The pain was extremely sharp. Very like someone
12 was sticking a knife in you.

13 Q And when he -- how long was the scope inside of
14 you before he finally -- before he took it out?

15 A He took it out immediately.

16 Q And did that sharp pain remain?

17 A Somewhat. Yes. Somewhat.

18 Q Now, who was in the room at this point?

19 A Just he and Nurse Kirby.

20 Q What happened next?

21 A Can I just back up one second?

22 Q Sure.

23 A When he took the scope out, I get on my --
24 partially on my side and I said, "What's next? What are you
25 doing?" And there was nobody in that room beside Kirby and

1 him and the door was still closed.

2 Then they had me lean over again--

3 I'm sorry, is it okay to continue?

4 Q Yes.

5 A They had me lean over again and he said, "Sir,
6 I'll put more gel on you." He didn't say "gel," he just
7 slapped some more stuff on me.

8 Q Did he explain, at all, as to why he needs to put
9 more jelly on it, or why he needed to take the scope out?

10 A All he said is, "I'm sorry. I'm sorry. I'm
11 sorry, sir. I'm sorry." Very apologetic.

12 Q Okay.

13 A Then he inserted it a second time. It was
14 uncomfortable.

15 Q Did the sharp pain still remain?

16 A There was still a sharp pain, not as sharp as it
17 was when he initially went in, but there was still pain
18 there.

19 Then he continued going up for about seven or
20 eight minutes and I don't want to look at the monitor
21 anymore because I was afraid to look at the monitor. I
22 don't like--

23 And then he screamed out, "I go too high! I go
24 too high!" He yelled it out, yelled it out, like very
25 panicky; yelled it out.

1 Then he called the nurse to, "Go get doctor! Go
2 get doctor!" That's what he said, "Go get doctor!" He
3 didn't mention the name, just "Go get doctor!"

4 And I was petrified. I was petrified.

5 She opened the door, go running for the doctor.

6 Q Now, how do you know she opened the door to go
7 running for the doctor.

8 A Because I heard her opening it.

9 Q Okay. Now, were you still on--

10 A She opened it and closed it.

11 MS. SUGARMAN: Hold on a second.

12 THE WITNESS: I'm sorry.

13 BY MR. WILMOT:

14 Q Were you still on your side at this point?

15 A At this point, I was afraid to move. He still had
16 his hand on the scope.

17 Q So the scope stayed in as you heard--

18 A Her run to the -- open the door--

19 Q Let me just finish the--

20 A Yes, sir. I'm just, you know--

21 Q The scope was still inside you when you heard
22 Nurse Kirby open the door, leave, and close the door behind
23 her.

24 A Yes. I heard her close the door behind her
25 because I'm anticipating someone come in.